

**CRIMINAL COMPLAINT**

STATE OF WISCONSIN

DA Case No.: 2014ML002207

Plaintiff,

vs.

Complaining Witness:

Det. CHAD BOWLER 725

Arvelo, Aron S  
11200 West Cleveland Avenue, #62  
West Allis, WI 53227  
DOB: 08/31/1987

Court Case No.:

Defendant,

THE ABOVE NAMED COMPLAINING WITNESS BEING DULY SWORN, ON INFORMATION  
AND BELIEF STATES THAT:

**Count 1: CAPTURE AN IMAGE OF NUDITY WITHOUT CONSENT**

The above-named defendant between November 1, 2013 and December 10, 2013, at 949 North 9th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did capture a representation that depicts nudity without the knowledge and consent of the person who was depicted nude while that person was nude in a circumstance in which s/he has a reasonable expectation of privacy, where the defendant had reason to know that the person who was depicted nude did not know of and consent to the capture of the representation, contrary to sec. 942.09(2)(am)1, 939.50(3)(i) Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

**Count 2: POSSESS / DISTRIBUTE / EXHIBIT RECORDING OF NUDITY WITHOUT CONSENT**

The above-named defendant on or about January 20, 2014, at 949 North 9th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did possess a representation that depicts nudity without the knowledge and consent of the person who was depicted nude while that person was nude in a circumstance in which s/he has a reasonable expectation of privacy, where the defendant had reason to know that the person who was depicted nude did not know of and consent to the capture of the representation, contrary to sec. 942.09(2)(am)1, 939.50(3)(i) Wis. Stats., contrary to sec. 942.09(2)(am)3, 939.50(3)(i) Wis. Stats.

Upon conviction for this offense, a Class I Felony, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than three (3) years and six (6) months, or both.

**Count 3: INVASION OF PRIVACY (SURVEILLANCE DEVICE)**

The above-named defendant between February of 2013 and January 20, 2014, at 949 North 9th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did knowingly install a surveillance device in a private place, with intent to observe any nude or partially nude person without the consent of the person observed, contrary to sec. 942.08(2)(a), 939.51(3)(a) Wis. Stats.



Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

**Count 4: INVASION OF PRIVACY (SURVEILLANCE DEVICE)**

The above-named defendant between February of 2013 and January 20, 2014, at 949 North 9th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did knowingly install a surveillance device in a private place, with intent to observe any nude or partially nude person without the consent of the person observed, contrary to sec. 942.08(2)(a), 939.51(3)(a) Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

**Count 5: INVASION OF PRIVACY (SURVEILLANCE DEVICE)**

The above-named defendant between February of 2013 and January 20, 2014, at 949 North 9th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, did knowingly install a surveillance device in a private place, with intent to observe any nude or partially nude person without the consent of the person observed, contrary to sec. 942.08(2)(a), 939.51(3)(a) Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendant may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

**Count 6: DISORDERLY CONDUCT**

The above-named defendant between February of 2013 and January 20, 2014, at 1025 North 8th Street, in the City of Milwaukee, Milwaukee County, Wisconsin, while in a public place, did engage in otherwise disorderly conduct, under circumstances in which such conduct tended to provoke a disturbance, contrary to sec. 947.01(1), 939.51(3)(b) Wis. Stats.

Upon conviction for this offense, a Class B Misdemeanor, the defendant may be fined not more than One Thousand Dollars (\$1,000), or imprisoned not more than ninety (90) days, or both.

I am a Milwaukee County Sheriff's Department deputy and base this complaint upon my review of Milwaukee County Sheriff's department reports. Said reports state as follows:

Females Correction Officers found what appeared to be a USB camera (looking similar to a flash drive) in the women's locker room in a secure part of the Criminal Justice Facility on January 20, 2014. This was turned over to leadership staff of the Milwaukee County Sheriff's department.

A review of the camera's memory card showed multiple videos and Detectives from the Sheriff's Department were able to identify the women shown in the videos and none of them consented to being filmed nor were aware they were being filmed. It should be noted the time stamps on the videos were not accurate.

**As to Count 1:**

The video is dated 1/6/09 and shows a camera being placed into position behind a shoe in the women's locker room at the above address. The video shows, KME, an adult citizen, removing her uniform shirt, then removing her uniform pants. As KME is changing into "street" clothes, the video depicts her bare buttocks. KME identified herself in the video and did not consent to any recording of herself in the secure locker room. When shown the video KME became distraught stating she thought she had an expectation of privacy in the women's locker room. KME

identified a sticker on her backpack which she placed there sometime between the above referenced dates.

**As to Count 2:**

The video of KME, as referenced above was still in the defendant's possession on January 20 2014.

**AS to Count 3:**

The Detective observed a video date stamped 2/11/09 that is set up in the women's locker room at the above referenced address. the video shows an unknown correctional officer walking by. This video is pointing in the direction of MF's assigned locker.

**As to Count 4:**

Detective Desotell observed a video date stamped 2/14/09 that is set up in the women's locker room at the above address. this video is pointed in the direction of MF's assigned locker. On the video one can see MF remove her uniform pants, redress and exit the locker room. MF at no time gave consent to being video taped.

**AS to Count 5:**

Detective Desotell observed a video date stamped 2/18/09 which shows a camera being set in the women's secure locker room at the above referenced address. this appears to be a different video from count 3 and 4 based on the date stamp and the lack of activity shown in the video.

**As to Count 6:**

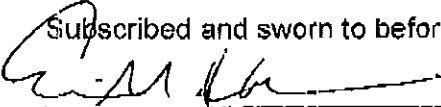
Detective Desotell observed 4 videos of H.B, and adult citizen. All of the videos were recorded at the above referenced address which is the M.A.T.C parking structure. the focus of the video is HB's car. In one video date stamped, 4/5/09, the camera is pointed at the sunroof from the level above and shows HB entered her car. Another video shows HB in the booking area of the County Jail and captures her entire body from the side and behind while wearing shorts or a skirt. One video date stamped 2/23/09 shows the MATC parking structure and the defendant peer over from the level above. The video records HB walking to her car within the parking structure. the defendant placed the camera underneath the driver's side mirror on the ground facing upwards. Because of the positioning of the camera, when HB walked towards her car, the camera records under her dress with a limited view. HB observed the camera and the defendant came down from the level above and said that it was his flash drive. These videos caused a disturbance when HB was told about them by Detectives.

**As to all counts:**

The defendant admitted purchasing the camera in February 2013. he admitted entering the women's locker room with the purpose of recording them undressing and using his key card access the locker room. The defendant would enter the locker room, set the camera to record, exit the locker room then come back shortly thereafter to retrieve the camera. The defendant also admitted putting the camera in the MATC parking structure in such a place that he hoped to record up HB's skirt.

\*\*\*\*End of Complaint\*\*\*\*

Subscribed and sworn to before me and approved for filing this 4 day of February, 2014.

  
Erin M. Karshen  
Assistant District Attorney  
1036930

  
Dep. Carl Bowdler  
Complaining Witness